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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

RS OLD MILL, LLC,

Case No. 17-22218 (RDD)

Debtor.

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**NOTICE OF WITHDRAWAL OF MOTION OF NOVARTIS CORPORATION  
FOR ORDER ALTERNATIVELY (I) ALLOWING IT AN ADMINISTRATIVE  
EXPENSE FOR THE DEBTOR'S BREACH OF AN ASSUMED CONTRACT, AND  
DIRECTING THE ESCROW AGENT TO RELEASE THE CONTRACT DEPOSIT TO  
NOVARTIS IN PAYMENT; OR (II) GRANTING NOVARTIS RELIEF FROM THE  
AUTOMATIC STAY**

**PLEASE TAKE NOTICE** that the Motion of Novartis Corporation for the entry of an order (a) allowing Novartis an administrative expense for the breach by the Debtor of its assumed Agreement of Sale between Novartis and the Debtor, and directing the Escrow Agent to release the deposit tendered by or on behalf of the Debtor to Novartis in payment; (b) alternatively, granting Novartis relief from the automatic stay to pursue its contractual and legal rights with respect to the Agreement of Sale in the state court case commenced prepetition by the Debtor against Novartis, and (c) granting other related relief, filed with the Court on August 21, 2017 (Doc. 60), is hereby withdrawn.

Dated: New York, New York  
September 6, 2017

WINDELS MARX LANE & MITTENDORF, LLP  
*Attorneys for Novartis Corporation*

By: /s/ Leslie S. Barr  
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